

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

GERARD JACKSON, individually and  
on behalf of all others similarly  
situated,

Plaintiff,

v.

WALKER ADVERTISING, LLC, and  
JOHN DOE LEAD GENERATOR,

Defendants.

No.: 4:24-CV-00934

(Hon. Matthew W. Brann)

**WALKER ADVERTISING, LLC’S UNOPPOSED MOTION TO EXTEND  
TIME TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Defendant Walker Advertising, LLC (“Walker”) respectfully moves the Court for a second extension of time, through and including August 23, 2024, to answer or otherwise respond to Plaintiff’s Complaint. In support of this motion, Walker states as follows:

1. On June 6, 2024, Plaintiff filed the Complaint. *See* Dkt. 1.
2. On June 10, 2024, Plaintiff purported to effectuate service of the Complaint on Walker, setting Walker’s initial deadline to answer or otherwise respond to the Complaint as July 1, 2024, pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i). *See* Dkt. 7.
3. On June 21, 2024, Walker filed a stipulation between Plaintiff and Walker for a 60-day extension of time from the date of service to answer or otherwise

respond to Plaintiff's Complaint. *See* Dkt. 10. The Court approved the stipulation, setting August 9, 2024 as Walker's deadline to answer or otherwise respond to the Complaint. *See* Dkt. 13.

4. Since that time, Plaintiff and Walker have engaged in discussions in an attempt to resolve this case without the need for additional litigation. To allow Plaintiff and Walker time to formalize a resolution, Walker respectfully requests that the Court grant this motion for an extension and set its deadline to answer or otherwise respond to the Complaint as August 23, 2024. The requested extension will not prejudice either party and will serve the interests of judicial efficiency and conservation of resources.

5. Walker's counsel has conferred with Plaintiff's counsel, and Plaintiff's counsel indicated that Plaintiff does not oppose the relief requested in this motion.

WHEREFORE, Walker respectfully requests that this Court grant this unopposed motion extending the deadline of Walker to answer or otherwise respond to Plaintiff's Complaint until August 23, 2024.

Dated: August 8, 2024

Respectfully submitted,

/s/ Thomas J. Giblin

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*Attorneys for Defendant Walker Advertising,  
LLC*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 8, 2024, the foregoing document was electronically filed with the Clerk of the Court by using the CM/ECF system, which served all relevant parties.

Dated: August 8, 2024

/s/ Thomas J. Giblin

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